

Charles Spagnoli

From: Charles Spagnoli
Sent: Thursday, February 21, 2019 3:17 PM
To: 'Willa Payne'
Cc: Josh Cotter; Susan Young
Subject: Spero v. Vestal CSD et al. - deposition schedule

Dear Willa,

I am in receipt of your correspondence. As I understand it, these are the confirmed deposition dates:

3/6 – Mrs. Spero and Brittany Spero – Syracuse
3/21 – Vincent Spero conclusion and Clifford Kasson – Binghamton (will you arrange for the location and court reporter, for both depositions?)
3/22 – Judy Vieux and likely another deponent TBD – Binghamton
3/26 – Jeff Ahearn – Binghamton
3/27 – Aja Holloway – Rochester

All are starting at 10 a.m. except for 3/21, when we will start with Vincent at 12:15.

In response to your new request to add the deposition of Ms. Paushter, I am inquiring regarding her availability (and confirming whether she is still employed by the school district).

Please note that the March 7, 11, 12, 14, and 15 dates you listed do not work for me as I am on vacation out of state, and the March 18, 19, 20, and 25 dates do not work for me as I have depositions scheduled in other matters on those dates. Also, of course, March 27 probably will not work as we will be in Rochester for Ms. Holloway's deposition. That puts the possible dates for Ms. Paushter out to the last day you listed before the discovery deadline, which is March 29.

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